



November 29, 2018

Repp Law Firm
1629 K Street, N.W., Suite 300
Washington, D.C. 20006-1631
T 202.656.1619
F 202.400.3737
marissa@repplawfirm.com
www.repplawfirm.com

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: MB Docket No. 13-249 (Revitalization of the AM Radio Service)

Dear Ms. Dortch:

On March 21, 2016, The AM Radio Preservation Alliance (“AMRPA”) timely submitted Comments on the Commission’s Further Notice of Proposed Rule Making, FCC 15-142 (rel. Oct. 23, 2015), in MB Docket No. 13-249, through the Commission’s Electronic Comment Filing System (“ECFS”). Due to the length of the AMRPA’s Comments and exhibits, the AMRPA submission on March 21, 2016 was separated into several portions for uploading to ECFS. Attached are the ECFS Filing Receipts as generated on March 21, 2016, confirming that the entire set of AMRPA’s Comments and referenced exhibits were received and accepted by ECFS.

It has recently been brought to the undersigned’s attention that, notwithstanding that all the portions of the AMRPA’s Comments and exhibits uploaded on March 21, 2016 were confirmed as received by ECFS, the second portion of the AMRPA’s Comments and exhibits – specifically, Exhibits B, C and D – are not viewable on ECFS in MB Docket No. 13-249. Exhibits B, C and D were identified in the List of Exhibits to the AMRPA Comments (copy attached), which such List of Exhibits was filed in ECFS as part of the first portion of the AMRPA’s Comments. Moreover, the findings of these three exhibits were summarized in the body of the AMRPA’s Comments.

To ensure that the Commission’s records are complete, this submission is including the pdf of the Exhibits B, C and D as originally uploaded to ECFS on March 21, 2016.

Marlene Dortch, Secretary
November 29, 2018
Page 2

Respectfully submitted,

REPP LAW FIRM

By: 
Marissa G. Repp

Counsel to The AM Radio Preservation Alliance

Attachments (ECFS Confirmations dated March 21, 2016; List of Exhibits included in the AMRPA Comments dated March 21, 2016; Exhibits B, C and D to the AMRPA Comments as uploaded to ECFS on March 21, 2016)

Your submission has been accepted

ECFS Filing Receipt - Confirmation number: 2016321751848

Proceeding

Name	Subject
13-249	Revitalization of the AM Radio Service

Contact Info

Name of Filer: The AM Radio Preservation Alliance
Email Address: marissa@repplawfirm.com
Attorney/Author Name: Marissa G. Repp, Esq.
Lawfirm Name (required if represented by counsel): Repp Law Firm

Address

Address For: Law Firm
Address Line 1: 1629 K Street, NW
Address Line 2: Suite 300
City: Washington
State: DISTRICT OF COLUMBIA
Zip: 20006
+4: 1631

Details

Type of Filing: COMMENT

Document (s)

File Name	Custom Description	Size
The AM Radio Preservation Alliance Comments AM Revitalization FNPRM Final 3_21_2016 with List of Exhibits and Exhibit A.pdf	Comments, List of Exhibits and Exhibit A	1 MB
Exhibits B C D 3_21_2016.pdf	Exhibits B C D	595 KB
Exhibit E Skywave Listeners Surveys 3_21_2016 NEW.pdf	Exhibit E	1 MB
Exhibits F G H I J NEW.PDF	Exhibits F G H I J	3 MB
Exhibits K L M N O 3_21_2016 NEW.pdf	Exhibit K L M N O	635 KB

Disclaimer

This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus, or automated links to other documents.

Filings are generally processed and made available for online viewing within one business day of receipt. You may use the link below to check on the status of your filing:

<http://apps.fcc.gov/ecfs/comment/confirm?confirmation=2016321751848>

For any problems please contact the Help Desk at 202-418-0193.



Your submission has been accepted

ECFS Filing Receipt -
Confirmation number:
2016321122954**Proceeding**

Name	Subject
13-249	Revitalization of the AM Radio Service

Contact Info

Name of Filer: The AM Radio Preservation Alliance
Email Address: marissa@repplawfirm.com
Attorney/Author Name: Marissa G. Repp, Esq.
Lawfirm Name (required if represented by counsel): Repp Law Firm

Address

Address For: Law Firm
Address Line 1: 1629 K Street, NW
Address Line 2: Suite 300
City: Washington
State: DISTRICT OF COLUMBIA
Zip: 20006
+4: 1631

Details

Type of Filing: EXHIBIT

Document(s)

File Name	Custom Description	Size
EXHIBIT P Q	The AM Radio Preservation Alliance	1
NEW.PDF	Comments - EXHIBITS P and Q	MB

Disclaimer

This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus, or automated links to other documents.

Filings are generally processed and made available for online viewing within one business day of receipt. You may use the link below to check on the status of your filing:

<http://apps.fcc.gov/ecfs/comment/confirm?confirmation=2016321122954>

For any problems please contact the Help Desk at 202-418-0193.

COMMENTS OF THE AM RADIO PRESERVATION ALLIANCE
ON FURTHER NOTICE OF PROPOSED RULE MAKING

LIST OF EXHIBITS

Exhibit	Topic
A	Class A AM Radio Stations Licensed to the Members (or to their Respective Licensee Subsidiaries) of The AM Radio Preservation Alliance
B	B-1: 56 Class A AM Stations Represent a Significant Proportion of Listening (Nielsen National Regional Database) B-2: Class A AM Stations Drive Overall AM Relevance (Nielsen Audio)
C	Analysis of Population Losses of <i>FNPRM</i> Class A Proposal (Cavell, Mertz & Associates, Inc.)
D	Analysis of Population Losses of <i>FNPRM</i> Class A Proposal by American Indian Lands (Cavell, Mertz & Associates, Inc.)
E	Support from Class A AM Station Skywave Listeners E-1: WGY, WCKY, WLW, WTAM, KOA, WHO, KFI, WHAS, WLAC, WOR, KFAB, KEX, WRVA, KFBK, WOIA, WWVA E-2: WBT E-3: KXEL
F	<i>FNPRM</i> Nighttime Interference-Free (“NIF”) Service Losses: F-1: WPHT F-2: WSB F-3: KMOX F-4: Sample Nighttime Upgrade Scenario: 1210 kHz, 1120 kHz, 750 kHz
G	WWL(AM), New Orleans, Louisiana, Statement of Diane Newman before the FCC, September 15, 2005
H	WWL/WRNO Hurricane Katrina Recovery/Rebuilding Programming, 24/7 Coverage, 4 th Quarter Report, October – November 6, 2005
I	I-1: “A Lifeline Sent by Airwave,” Ellen Barry, <i>Los Angeles Times</i> , September 10, 2005 I-2: “Radio station offers a virtual trip back home,” James Rainey, <i>Tribune Newspapers</i> , January 2, 2006
J	J-1: Letter dated October 6, 1994, from American Meteorological Society to Kirk Melhuish, WSB(AM) J-2: E-mail correspondence dated April 9, 1998, from Ben Reagan to Kirk Melhuish, c/o W.S. Buggy J-3: Letter dated February 16, 2000, from Greg Brooks, Communications Coordinator, Walton Electric Membership Corporation, to David Meszaros, General Manager, WSB(AM) J-4: “Hurricane Hugo: Destruction in Charleston: Atlanta’s WSB Kept on Top of Airwaves: Widespread Listeners Stay Storm-Informed,” <i>The Atlanta Journal</i> and the <i>Atlanta Constitution</i> , September 23, 1989
K	Primary Entry Point (“PEP”) Class A AM Stations
L	Class A AM LP-1 Stations

Exhibit	Topic
M	Letter of James de Castro, President and General Manger, WGN-AM Radio
N	“Kentucky Hero Called Truckers.” Chalcedon
O	“D.C. sniper: Bozo recalls ‘the night it all went down,’” Reed Black, <i>Landline Magazine</i> , October 10, 2009
P	<p><i>FNPRM</i> Increase in Critical Hours Interference</p> <p>P-1: WCKY, Cincinnati, OH</p> <p>P-2: WPHT, Philadelphia, PA</p> <p>P-3: WBT, Charlotte, NC</p> <p>P-4: KMOX, St. Louis, MO</p> <p>P-5: WBAL, Baltimore, MD</p> <p>P-6: KFAB, Omaha, NE</p>
Q	<p>Impact of <i>FNPRM</i> Proposed Change to 2 mV/m Contour Protection for Class B, C and D AM Stations</p> <p>Q-1: Interference Received to WONE Upgrade from Upgrades</p> <p>Q-2: Existing WONE Received Interference</p> <p>Q-3: Interference Caused by WONE Upgrade</p> <p>Q-4: Existing WONE Caused Interference</p> <p>Q-5: Interference Received to WWBG Upgrade from Upgrades</p> <p>Q-6: Interference Caused by WWBG Upgrade</p> <p>Q-7: Existing WWBG Interference Caused and Received</p>